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Attorney for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

NAJEEB RAHMAN,)

Defendant.)

Case No. 2:15-cr-0178-LDG-GWF

**STIPULATION TO CONTINUE
DEFENDANT'S SENTENCING HEARING**

(Second Request)

Certification: In accordance with Local Rule 12-1(c), the parties, by and through undersigned counsel, certify that this stipulation is timely filed.

Pursuant to this Court's Local Rule 45-1, the parties respectfully request that the Court approve this stipulation to continue Defendant's sentencing hearing, currently scheduled for March 17, 2016, by at least 30-days or to a date no earlier than April 22, 2016. This is the parties' second request for a continuance for the purpose identified herein.

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1 In support of this stipulation, the parties rely upon the following points:

2 1. On October 1, 2015, Defendant entered a plea of “guilty” to count one of an
3 information filed with the Court that same day. This was in accordance with the terms of a plea
4 agreement entered into between the parties and filed with the Court. The Court accepted
5 Defendant’s plea and set this matter for “Sentencing and disposition” on January 11, 2016.
6 Subsequently, the parties filed a stipulation on December 30, 2015 to continue sentencing which
7 the Court granted on January 4, 2016. However, following that, the Court contacted the parties
8 and notified them of an issue effecting the availability of the courtroom which required
9 sentencing to be continued and, with the parties’ concurrence, continued sentencing until March
10 17, 2016 (after providing the parties with options regarding various dates).

11 2. At the time counsel for Defendant agreed to the present date of March 17, 2016,
12 he forgot that he is expected in San Francisco, California that week for oral argument before the
13 United States Court of Appeals for the Ninth Circuit. Accordingly, counsel for Defendant will
14 not have sufficient time that week to prepare for sentencing in this matter. Following his return,
15 the next two weeks thereafter will be extremely busy with depositions in a significant civil case
16 pending in federal court. Counsel for Defendant has reviewed his work calendar and wishes to
17 advise the Court that an additional 30-day extension of time will permit counsel for Defendant
18 sufficient time to prepare for sentencing, should the Court approve this request.

19 3. Counsel for Defendant has discussed this matter with Defendant who agrees that a
20 continuance of sentencing in this case is appropriate for the reasons set forth herein. In other
21 words, Defendant has no issue with a continuance of 30-days or more.

22 4. Government counsel, as evidenced by her signature below, agrees to this
23 stipulation for a continuance of the sentencing date.

24 . . .

25 . . .

1 The parties respectfully request that the Court approve this stipulation.

2 Respectfully submitted,

3 /s/ Kimberly Frayn

/s/ Paul S. Padda

4 Kimberly Frayn, Esq.
Assistant United States Attorney

Paul S. Padda, Esq.

5 Attorney for the United States

Attorney for Defendant

6 Dated: March 4, 2016

Dated: March 4, 2016

8 **IT IS SO ORDERED:**

9 **The parties stipulation to continue the date for**
10 **sentencing in this matter is hereby approved.**
11 **Sentencing and disposition in this case is hereby**
12 **continued to the following date and time:**

13 **Date:** Monday, April 25, 2016

14 **Time:** 10:00 a.m.

15 
UNITED STATES DISTRICT JUDGE
LLOYD D. GEORGE

16 **Dated:** 10 March 2016

17 **CERTIFICATE OF SERVICE**

18 In compliance with the Court's Local Rules, the undersigned hereby certifies that on
19 March 4, 2016 a copy of the foregoing document, "STIPULATION TO CONTINUE
20 DEFENDANT'S SENTENCING HEARING" was served (via the Court's CM/ECF system)
upon counsel of record for the United States.

21 /s/ Paul S. Padda

22 Paul S. Padda, Esq.